

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Where 2 Get It, Inc.

Plaintiff

v.

GeoTag Inc.

Defendant

Civil Action No. \_\_\_\_\_

Jury Trial Demanded

**COMPLAINT FOR DECLARATORY JUDGMENT**

Plaintiff Where 2 Get It Inc. (“W2GI” or “Plaintiff”) alleges as follows:

**NATURE OF THE CASE**

1. Plaintiff seeks a declaratory judgment that U.S. Patent No. 5,930,474 (“the ‘474 Patent”) is invalid and is not infringed by the use of Plaintiff’s methods or products. The relief is necessary because Defendant (“GeoTag”) has sued more than 300 entities, claiming that they infringe the ‘474 Patent by using web mapping services, usually to show their store locations. Many of the defendants sued by GeoTag are customers of Plaintiff. The suits have placed a cloud on Plaintiff’s web mapping services, have caused customers to seek relief from Plaintiff, and have created a justiciable controversy between Plaintiff and GeoTag.

**PARTIES**

2. Plaintiff is an Illinois corporation, with its principal place of business located at 1240 N. Lakeview No. 170, Anaheim, California 92807.

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